UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

| In re DORAL FINANCIAL CORP. SECURITIES LITIGATION | |
|---|--|
| This Document Relates To: ALL ACTIONS. | |

Master Docket No. 1:05-md-01706-RO (Civil Action No. 1:05-cv-04014-RO)

ELECTRONICALLY FILED

DECLARATION OF SAMUEL H.
 RUDMAN FILED ON BEHALF OF
 LERACH COUGHLIN STOIA GELLER
 RUDMAN & ROBBINS LLP IN SUPPORT
 OF APPLICATION FOR AWARD OF
 ATTORNEYS' FEES AND EXPENSES

I, SAMUEL H. RUDMAN, declare as follows:

- 1. I am a member of the firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP.

 I am submitting this declaration in support of my firm's application for an award of attorneys' fees and expenses in connection with services rendered in the above-entitled action.
 - 2. This firm is Lead Counsel of record for Plaintiffs.
- 3. The identification and background of my firm and its partners is attached hereto as Exhibit A.
- 4. The total number of hours spent on this litigation by my firm is 3,990.75. The total lodestar amount for attorney/paralegal time based on the firm's current rates is \$1,823,540.00. The hourly rates shown below are the usual and customary rates charged for each individual in all of our cases. A breakdown of the lodestar is as follows:

| NAME | | HOURS | RATE | LODESTAR |
|-------------------------|------|--------|------|------------|
| Bandman, Randi D. | (P) | 11.00 | 600 | 6,600.00 |
| Behar, Jonathan E. | (P) | 275.50 | 525 | 144,637.50 |
| Doyle, William J. | (P) | 63.75 | 505 | 32,193.75 |
| Gusikoff Stewart, Ellen | (P) | 58.00 | 600 | 34,800.00 |
| Robbins, Darren J. | (P) | 138.00 | 650 | 89,700.00 |
| Rosenfeld, David | (P) | 25.25 | 520 | 13,130.00 |
| Rothman, Robert | (P) | 26.25 | 535 | 14,043.75 |
| Rudman, Samuel H. | (P) | 717.00 | 650 | 466,050.00 |
| Walton, David C. | (P) | 11.75 | 600 | 7,050.00 |
| Abadou, Ramzi | (A) | 62.00 | 420 | 26,040.00 |
| Ghozland, Michael | (A) | 149.50 | 420 | 62,790.00 |
| Gunyan, Russell | (A) | 638.50 | 515 | 328,827.50 |
| Kowalewski, Catherine | (A) | 4.25 | 445 | 1,891.25 |
| Reich, Mark | (A) | 304.50 | 460 | 140,070.00 |
| Mandlekar, Rajesh A. | (CA) | 21.00 | 400 | 8,400.00 |
| Mccormick, Tricia | (CA) | 113.50 | 350 | 39,725.00 |
| Barhoum, Anthony J. | (EA) | 60.75 | 315 | 19,136.25 |
| Kadota, Ryan H. | (EA) | 23.00 | 240 | 5,520.00 |
| Roelen, Scott R. | (EA) | 18.00 | 240 | 4,320.00 |
| Uralets, Boris | (EA) | 27.00 | 250 | 6,750.00 |

| NAME | | HOURS | RATE | LODESTAR |
|------------------------|------|----------|---------|----------------|
| Villalovas, Frank E. | (EA) | 47.50 | 315 | 14,962.50 |
| Aronica, Steven | (FA) | 356.50 | 450 | 160,425.00 |
| Brandon, Kelley T. | (I) | 8.00 | 360 | 2,880.00 |
| Tomalonis, Michelle M. | (I) | 6.75 | 300 | 2,025.00 |
| Paralegals I | | 282.75 | 220-270 | 70,317.50 |
| Paralegals II | | 92.75 | 200-250 | 20,972.50 |
| Paralegals III | | 448.00 | 175-240 | 100,282.50 |
| TOTAL: | | 3,990.75 | | \$1,823,540.00 |

- (P) Partner
- (A) Associate
- (CA) Contract Attorney
- (EA) Economic Analyst
- (FA) Forensic Accountant
- (I) Investigator
- 5. My firm incurred a total of \$239,096.12 in expenses in connection with the prosecution of this litigation. They are broken down as follows:

EXPENSES

From Inception to July 5, 2007

| DISBURSEMENT | | TOTAL |
|---|-------------|--------------|
| Meals, Hotels & Transportation | | \$ 14,207.51 |
| Photocopies | | 16,716.75 |
| Postage | | 897.97 |
| Telephone, Facsimile | | 1,418.66 |
| Messenger, Overnight Delivery | | 766.35 |
| Filing, Witness & Other Fees | | 1,844.00 |
| Court Reporters | | 133.17 |
| Lexis, Westlaw, Online Library Research | | 15,600.73 |
| Class Action Notices/Business Wire | | 9,935.00 |
| Mediation Fees (JAMS, Inc.) | | 61,399.33 |
| Experts/Consultants/Investigators | | 116,176.65 |
| Outside: | | |
| PMA Corp. | \$ 2,015.00 | |
| Joseph Drexler | 300.00 | |
| Finecon Partners | 5,475.00 | |
| The Corporate Library | 6,863.00 | |
| T.A. Myers & Co. | 18,375.00 | |
| L.R. Hodges & Associates | 80,788.65 | |

| Lily Haggerty | 2,360.00 | |
|---------------|----------|---------------|
| TOTAL | | \$ 239,096.12 |

- 6. The following is additional information regarding these expenses:
- (a) The firm incurred expenses of \$133.17 for amounts paid to court reporters for transcripts of court hearings and depositions.

| DATE | VENDOR |
|----------|--|
| 03/15/06 | American Express – copy of transcript of hearing |

(b) Filing, Witness and Other Fees: \$1,844.00.

| DATE | VENDOR | | |
|----------|-------------------------------------|--|--|
| 04/22/05 | Clerk of the Court | | |
| 04/29/05 | D&D Process Service, Inc. | | |
| 05/31/05 | Clerk of the Court | | |
| 06/03/05 | D&D Process Service, Inc. | | |
| 07/06/05 | Clerk of the Court | | |
| 07/06/05 | 1st Nationwide Legal Services, Inc. | | |
| 07/20/05 | 1st Nationwide Legal Services, Inc. | | |
| 05/12/06 | D&D Process Service, Inc. | | |
| 06/01/06 | Clerk of the Court | | |
| 06/23/06 | D&D Process Service, Inc. | | |

(c) Meals, Hotels and Transportation: \$14,207.51. Expenses for meals, hotels and transportation were incurred for the following purposes:

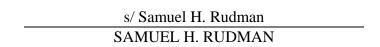
| NAME | DATE | DESTINATION | PURPOSE |
|--------------------|------------|---------------|-------------------------------|
| Ghozland, Michael | 09/28/05 - | Asheville, NC | Prepare for and attend MDL |
| | 09/29/05 | | panel oral argument |
| Behar, Jonathan E. | 09/28/05 - | Asheville, NC | Prepare for and attend MDL |
| | 09/29/05 | | panel oral argument |
| Abadou, Ramzi | 12/14/05 - | New York, NY | Attend lead plaintiff hearing |
| | 12/18/05 | | |
| Rudman, Samuel | 12/15/05 | New York, NY | Attend lead plaintiff hearing |
| Rosenfeld, David | 12/15/05 | New York, NY | Attend lead plaintiff hearing |
| Rudman, Samuel | 10/11/06 | New York, NY | Attend meeting |
| Robbins, Darren | 10/25/06 | New York, NY | Prepare for mediation |
| Gunyan, Russell | 12/15/06 | New York, NY | Attend meeting |

(d) Photocopying: In-house (63,655 copies @ \$0.25 per copy): \$15,913.75 Outside Photocopy Expenses: \$803.00

| DATE | VENDOR |
|----------|---|
| 08/01/05 | Gary McClurg – copies of various complaints |

- (e) Lexis, Westlaw, Online Library Research: \$15,600.73. These included vendors such as Disclosure, Inc., Dow Jones Interactive, Dow Jones & Co., Inc., Lexis Nexis, CDA Investment Technologies, Pacer Service Center, West Publishing Corporation and Choice Point. These databases were used to obtain access to Doral SEC filings and to do media searches regarding Doral. The charges for these vendors vary depending upon the type of services requested.
- 7. The expenses pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from expense vouchers, check records and other documents and are an accurate record of the expenses.

I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct. Executed this 9th day of July, 2007, at Melville, New York.



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CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

In addition, service on the following parties will be provided by hand on July 10, 2007:

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s/ Samuel H. Rudman

SAMUEL H. RUDMAN

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Mailing Information for a Case 1:05-md-01706-RO

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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